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E-Filed on 11/10/09

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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

USA Commercial Mortgage Company,

USA Capital Realty Advisors, LLC,<sup>1</sup>USA Capital Diversified Trust Deed Fund,  
LLC,USA Capital First Trust Deed Fund, LLC,<sup>2</sup>USA Securities, LLC,<sup>3</sup>  
Debtors.

Case No. BK-S-06-10725-LBR  
Case No. BK-S-06-10726-LBR<sup>1</sup>  
Case No. BK-S-06-10727-LBR  
Case No. BK-S-06-10728-LBR<sup>2</sup>  
Case No. BK-S-06-10729-LBR<sup>3</sup>

CHAPTER 11

Jointly Administered Under Case No.  
BK-S-06-10725 LBR

**Stipulation re Proof of Claim Filed by  
Joanne Halvorson**

**Affects:**

- ☐ All Debtors  
☒ USA Commercial Mortgage Company  
☐ USA Capital Realty Advisors, LLC  
☐ USA Capital Diversified Trust Deed Fund, LLC  
☐ USA Capital First Trust Deed Fund, LLC  
☐ USA Securities, LLC

USACM Liquidating Trust (the "USACM Trust"), by and through its counsel,  
Lewis and Roca LLP, and Joanne Halvorson ("Halvorson"), represent to the Court as  
follows:

<sup>1</sup> This bankruptcy case was closed on September 23, 2008.

<sup>2</sup> This bankruptcy case was closed on October 12, 2007.

<sup>3</sup> This bankruptcy case was closed on December 21, 2007

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1. Joanne Halvorson filed proof of claim No. 10725-02551 in the amount of \$22,482.01 unsecured and \$22,482.01 priority, for a total of \$44,964.02. Pursuant to an order of the court, dated October 31, 2007 [DE 5197], the claim was reclassified as unsecured.

2. The Twenty Sixth Omnibus Objection of USACM Liquidating Trust to Double Counted Proofs of claim [DE 7553] included an objection to Halvorson claim 10725-002251 and requested that the double counted portion of the claim, \$22,482.01, be disallowed and the claim reduced to \$22,482.01. Halvorson does not object to the disallowance of the double-counted portion of the claim.

3. The USACM Liquidating Trust's Motion to Authorize First Interim Distribution to Unsecured Creditors [DE 7486] filed with the Court listed Halvorson's allowed amount of claim no. 10725-02251 as \$21,788.66.

4. At Halvorson's request, the Trust has agreed to allow Halvorson's proof of claim No. 10725-02251 as an unsecured claim in the amount of \$22,482.01.

5. Accordingly, the Trust and Halvorson stipulate and agree:

- Proof of claim No. 10725-02251 may be allowed as an unsecured-non-priority claim in the amount of \$22,482.01.
- Exhibit A to the Order Approving the Motion for Interim Distribution may be adjusted to reflect the agreement of the parties.

LEWIS AND ROCA LLP

JOANNE HALVORSON

By s/John Hinderaker  
Rob Charles NV (#6593)  
John Hinderaker (AZ 18024  
*pro hac vice*)  
Attorneys for USACM Liquidating  
Trust

By: s/ Joanne Halvorson  
3716 N. Normandie  
Spokane, WA 99205

Dated: October 21, 2009

Dated: *Nov-3, 2009*